

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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**In re Maureen Julie Plevin**

**Debtor(s)**

**Chapter 13**

**Case No.: 15-20144-GMH**

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**Objection to Motion for Relief from Stay and Co-Debtor Stay**

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The Debtor, Maureen Plevin, by Consumer Advocates of Wisconsin, LLC, by Attorney Jonathan Mas, files this Objection to creditor Nationstar Mortgage, LLC's (the "Movant") Motion for Relief from Stay. In support of this Objection, the Debtor asserts as follows:

1. The Debtor acknowledges that she has missed post-petition payments. The Debtor asserts she incurred unexpected expenses due to illness. Further, she asserts she is now working full time. She can resume her mortgage payments beginning with the payment due in February 2019 and maintain payments going forward. She can also fund a supplemental claim for any post-petition arrears due to the Movant.
  
2. The Debtor asserts that the subject property is the Debtor's homestead and thus necessary for an effective reorganization.

WHEREFORE, the Debtor requests that the Court deny the Motion for Relief from Stay and set this matter for a hearing.

Dated this 3<sup>rd</sup> day of January, 2019 at Milwaukee, Wisconsin

/s/

Consumer Advocates of Wisconsin, LLC  
Attorney for the Debtors  
By: Attorney Jonathan Mas  
State Bar No. 1084768

Drafted by:

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**Certificate of Service**

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I, Attorney Jonathan Mas, certify that on January 3, 2019, I served the **Objection to Motion for Relief** that was filed with the Court to the following parties by **first class U.S. mail** or, if so indicated below, by electronic service using the Court's CM/ECF system:

1. Attorney Michael Dimand of Marinosci Law Group, PC on behalf of Creditor Nationstar Mortgage, LLC by electronic service
2. Office of the US Trustee by electronic service.
3. Chapter 13 Trustee Rebecca R. Garcia by electronic service.

Dated this 3<sup>rd</sup> day of January, 2019

/s/

Consumer Advocates of Wisconsin, LLC  
Attorney for the Debtors  
By: Attorney Jonathan Mas  
State Bar No. 1084768